

FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT  
UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

CLIFFORD STEPHENS

(Enter above the full name of the plaintiff in this action)

COMPLAINT

v.  
STATE OF NEW  
JERSEY

Civil Action No. 59:8-8

(To be supplied by the Clerk of the Court)

(Enter the full name of the defendant or defendants in this action)

SOUTHWOODS STATE PRISON, MEAT PROCESSOR CORP

INSTRUCTIONS; READ CAREFULLY

1. This complaint must be legibly handwritten or typewritten, signed by the plaintiff and subscribed to under penalty of perjury as being true and correct. All questions must be answered concisely in the proper space on the form. Where more space is needed to answer any question, attach a separate sheet.
2. In accordance with Rule 8 of the Federal Rules of Civil Procedure, the complaint should contain (1) a short and plain statement of the grounds upon which the court's jurisdiction depends, (2) a short plain statement of the claim showing that you are entitled to relief, and (3) a demand for judgment for the relief which you seek.
3. You must provide the full name of each defendant or defendants and where they can be found.
4. You must send the original and one copy of the complaint to the Clerk of the District Court. You must also send one additional copy of the complaint for each defendant to the Clerk. Do not send the complaint directly to the defendants.
5. Upon receipt of a fee of \$400.00 (a filing fee of \$350.00, and an administrative fee of \$50.00), your complaint will be filed. You will be responsible for service of a separate summons and copy of the complaint on each defendant. See Rule 4, Federal Rule of Civil Procedure.

6. If you cannot prepay the \$400.00 fee, you may request permission to proceed in forma pauperis in accordance with the procedures set forth in the application to proceed in forma pauperis. See 28 U.S.C. §1915. (If there is more than one plaintiff, each plaintiff must separately request permission to proceed in forma pauperis.)

7. If you are given permission to proceed in forma pauperis, the \$50.00 Administrative Fee will not be assessed. The Clerk will prepare and issue a copy of the summons for each defendant. The copies of summonses and the copies of the complaint which you have submitted will be forwarded by the Clerk to the United States Marshal, who is responsible for service. The Marshal has USM-285 forms you must complete so that the Marshal can locate and serve each defendant. If the forms are sent to you, you must complete them in full and return the forms to the Marshal.

#### QUESTIONS TO BE ANSWERED

1a. Jurisdiction is asserted pursuant to (CHECK ONE)

☒ 42 U.S.C. §1983 (applies to state prisoners)

☐ Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics, 403 U.S. 388 (1971) and 28 U.S.C. § 1331 (applies to federal prisoners)

If you want to assert jurisdiction under different or additional statutes, list these below:

1b. Indicate whether you are a prisoner or other confined person as follows:

☐ Pretrial detainee

☐ Civilly-committed detainee

☐ Immigration detainee

☒ Convicted and sentenced state prisoner

☐ Convicted and sentenced federal prisoner

☐ Other: (please explain) \_\_\_\_\_

## 2. Previously Dismissed Federal Civil Actions or Appeals

If you are proceeding in forma pauperis, list each civil action or appeal you have brought in a federal court while you were incarcerated or detained in any facility, that was dismissed as frivolous or malicious, or for failure to state a claim upon which relief may be granted. Please note that a prisoner who has on three or more prior occasions, while detained in any facility, brought an action or appeal in a federal court that was dismissed as frivolous or malicious, or for failure to state a claim upon which relief may be granted, will be denied in forma pauperis status unless that prisoner is under imminent danger of serious physical injury. See 28 U.S.C. § 1915(g).

## a. Parties to previous lawsuit:

Plaintiff(s): C. Lifford STEPHENSDefendant(s): SOUTHWOODS STATE PRISON / MEAT PROCESSOR.b. Court and docket number: 59: 8-6

c. Grounds for dismissal: ( ) frivolous ( ) malicious

(x) failure to state a claim upon which relief may be granted

d. Approximate date of filing lawsuit: 12.16.2016e. Approximate date of disposition: NORTHERN STATE PRISON

If there is more than one civil action or appeal, describe the additional civil actions or appeals using this same format on separate sheets.

3. Place of Present Confinement? NORTHERN STATE PRISON

## 4. Parties

(In item (a) below, place your name in the first blank and place your present address in the second blank. Do the same for additional Plaintiffs, if any.)

a. Name of plaintiff: C. Lifford STEPHENS

Address: NORTHERN STATE PRISON / 168 FRONTAGE ROAD  
Inmate#: 000 8336360 / 952058

b. First defendant:

Name: SOUTH WOODS STATE PRISON / 215 S. BURLINGTON ROAD BRIDGETON, NJ 08302

Official position: PROCESSOR MEAT MIXER

Place of employment: PROCESS MEAT CORP

How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

THEY DID NOT PROVIDE THE CORRECT EQUIPMENT TO PROVIDE A SAFE WORKABLE ENVIRONMENT FOR STAFF AND OTHERS.

c. Second defendant:

Name: GOLD BOROUGH

Official position: OFFICER / TRANSPORTER

Place of employment: SOUTH WOODS STATE PRISON / 215 S. BURLINGTON ROAD BRIDGETON, NJ 08302

How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

ASSAULTED AND HELD BACK FROM ATTENDING THE TRUMA UNITED ON TIME, SO THAT FINGER COULD BE CARED FOR. THAT CAUSED AND INFECTION TOWARDS THE BONES INNER PARTS.

d. If there are more than two defendants, attach a separate sheet. For each defendant specify: (1) name, (2) official position, (3) place of employment, and (4) involvement of the defendant.

5. I previously have sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in the Statement of Claims on page 6.

☒ Yes ☐ No

If your answer is "Yes," briefly describe the steps taken, including how relief was sought, from whom you sought relief, and the results.

I've CONTACTED A PERSONAL INJURY LAWYER  
Pertaining To Potential Personal Injury CASE.  
Representation Pertaining To my finger being  
Amputated which occurred while incarcerated.

If your answer is "No," briefly explain why administrative remedies were not exhausted.

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6. Statement of Claims

(State here as briefly as possible the facts of your case. Describe how each defendant violated your rights, giving dates and places. If you do not specify how each defendant violated your rights and the date(s) and place of the violations, your complaint may be dismissed. Include also the names of other persons who are involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach a separate sheet if necessary.)

My RIGHTS were violated being as  
though, I was assaulted by officer  
Goldsborough with excessive force.  
With numerous punches, kicks and choke  
holds as well. THESE events took place on  
6-20-16, 6-24-16 as well on 6-27-16. I've  
Also asked for a polygraph which was

which was up held on 6.22.16 To  
6.27.16 as well on the date 6.29.16

The incident that concerned witnesses  
that bore to this was SGT Green,  
Vinni Gambino, LT Clarke.

THESE ARE the witnesses that seen  
and called for help within the facility.  
I was taken to a room placed on a  
LMS too be taken to a hospital  
that was located close by.

Also on my way to be housed on  
the frame unit for my finger being  
so severely sawed off, from the main  
joint, which took place, the day after,  
me being Assaulted. For me injuring  
my self in the work place on  
the compound AT 12:22, 6.17.16  
By officer Kp, officer M. Lanigan, Gary,  
the Commissioner, Robert Buechle, the  
Administrator.

## 7. Relief

(State briefly exactly what you want the Court to do for you. Make no  
legal arguments. Cite no cases or statutes.)

I seek to gain a Post conviction relief.  
from the state of New Jersey. Being as though  
I've taken too many losses wit financial  
fees. lost of health, family contact which caused

death to transpire. Within these past  
2 years I've been assailed then  
accused of being the one the  
causes the action before panel.  
Now I'm the only one left to carry  
on the legacy that my family  
left behind.

8. Do you request a jury or non-jury trial? (Check only one)

☒ Jury Trial ( ) Non-Jury Trial

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 26 day of February, 2018

Clifford Stephens

Signature of plaintiff\*

(\*EACH PLAINTIFF NAMED IN THE COMPLAINT MUST SIGN THE COMPLAINT  
HERE. ADD ADDITIONAL LINES IF THERE IS MORE THAN ONE PLAINTIFF.  
REMEMBER, EACH PLAINTIFF MUST SIGN THE COMPLAINT).